

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ELECTRALED, INC.,

Plaintiff,

v.

CHAUVET & SONS, LLC,

Defendant.

Case No. 2:24-cv-00511-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANT'S NOTICE OF COMPLETED BRIEFING AND RIPENESS REGARDING  
ITS RENEWED MOTION TO DISMISS OR TRANSFER FOR IMPROPER VENUE  
AND TO DISMISS FOR FAILURE TO STATE A CLAIM (DKT. 20)**

On October 15, 2024, Defendant Chauvet & Sons LLC (“Defendant” or “Chauvet”) filed a renewed motion to dismiss or transfer for improper venue under Rule 12(b)(3) and to dismiss for failure to state a claim under Rule 12(b)(6). *See* Dkt. 20. Briefing on Chauvet’s renewed motion was completed on March 5, 2025, after a 75-day venue discovery period. *See* Dkt. 35.

On May 24, 2025, Plaintiff ElectraLED Inc. (“Plaintiff” or “ElectraLED”) filed an opposed motion for leave to reply on deposition testimony in responsive briefing to Chauvet’s renewed motion to dismiss, seeking to supplement venue record. *See* Dkt. 41. On May 30, 2025, Chauvet filed its opposition to Plaintiff’s motion (Dkt. 42). Plaintiff filed its reply in support of its motion for leave on June 6, 2025 (Dkt. 45), and Chauvet filed its sur-reply on June 9, 2025 (Dkt. 47).

Accordingly, Chauvet files this notice of completed briefing in respect of its motion to dismiss, and hereby respectfully notifies the Court that the issue of whether venue is proper in this District as to Chauvet is ripe for ruling. A Claim Construction Hearing is currently scheduled for October 31, 2025. *See* Dkt. 17. To the extent a hearing on venue issues would be helpful for the Court, Chauvet is available for such hearing at the Court’s convenience.

Dated: July 7, 2025

Respectfully submitted,

/s/ Joseph J. Raffetto

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*Counsel for Defendant Chauvet & Sons, LLC*

**CERTIFICATE OF SERVICE**

I certify that on July 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Ky-Yen Wong  
Ky-Yen Wong